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13		DISTRICT COURT
14	UNITED STATES DISTRICT COURT	
15	DISTRICT	OF NEVADA
16		
17	LAS VEGAS SUN, INC., a Nevada corporation,	Case No. 2:19-cv-01667-GMN-VCF
18	Plaintiff,	STIPULATION AND ORDER TO VACATE ORDER GRANTING
19	v.	PLAINTIFF'S MOTION FOR LEAVE TO
20		AMEND AND CUDDI EMENT
- 1	SHELDON ADELSON, an individual and as	AMEND AND SUPPLEMENT COMPLAINT (ECF NO. 537), MOTION
	the alter ego of News+Media Capital Group	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an	COMPLAINT (ECF NO. 537), MOTION
21 22	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability company; LAS VEGAS REVIEW-JOURNAL,	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21 22	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21 22 23	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability company; LAS VEGAS REVIEW-JOURNAL, INC., a Delaware corporation; and DOES, I-X,	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21 22 23 24	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability company; LAS VEGAS REVIEW-JOURNAL, INC., a Delaware corporation; and DOES, I-X, inclusive,	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED
21 22 23 24 25	the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability company; LAS VEGAS REVIEW-JOURNAL, INC., a Delaware corporation; and DOES, I-X, inclusive,	COMPLAINT (ECF NO. 537), MOTION TO SEAL (ECF NO. 536), AND SEALED

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LAS VEGAS REVIEW-JOURNAL, INC., a Delaware corporation, Counterclaimant, v. LAS VEGAS SUN, INC., a Nevada corporation; BRIAN GRÉENSPUN, an individual and as the alter ego of Las Vegas Sun, Inc.; GREENSPUN MEDIA GROUP, LLC, a Nevada limited liability company, as the alter ego of Las Vegas Sun, Inc., Counterclaim-Defendants.

Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the "Sun"), by and through their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm, and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and PATRICK DUMONT (collectively the "Review-Journal"), by and through their counsel of record, Kemp Jones, LLP, and Jenner & Block LLP, hereby stipulate and agree as follows:

- 1. On December 23, 2021, the Sun filed a Motion for Leave to File Documents Under Seal [Exhibits 3 and 4 to Plaintiff's Motion for Leave to Amend and Supplement Complaint] [ECF No. 536]; Motion for Leave to Amend and Supplement Complaint [ECF Nos. 537 and 539 (FUS)]; and Appendix of Exhibits to Motion for Leave to Amend and Supplement Complaint [ECF Nos. 538 and 540 (FUS)].
- 2. On January 3, 2022, the parties submitted a Joint Stipulation for Entry of Second Amended Discovery Plan and Scheduling Order, and Extensions of Time for Briefing (First Requests). ECF No. 550. This Stipulation extended various deadlines in this matter, including extending Defendants' deadline to respond to the Sun's Motion for Leave to Amend and Supplement Complaint [ECF Nos. 537 and 539 (FUS)] and related motion to seal [ECF No. 536] from January 6, 2022, to January 20, 2022, and extending the Sun's reply deadline to February 10, 2022. *See* ECF No. 550 at 4, ¶¶ 8(c) and (d).
- 3. On January 4, 2022, the parties attended a hearing before Special Master Pro and the parties' Joint Stipulation at ECF No. 550 was granted, including extending Defendants' deadline to respond to the Sun's Motion for Leave to Amend and Supplement Complaint [ECF Nos. 537 and 539 (FUS)] and related motion to seal [ECF No. 536] from January 6, 2022, to January 20, 2022, and extending the Sun's reply deadline to February 10, 2022. *See* ECF Nos. 552 and 554.
- 4. On January 20, 2022, an Order was entered by U.S. Magistrate Judge Ferenbach granting Plaintiff's Motion for Leave to Amend and Supplement Complaint [ECF No. 537], Motion to Seal [ECF No. 536], and Sealed Motion [ECF No. 539] due to no responses being filed

1	by January 6, 2022. ECF No. 561.		
2	5. Because the parties have stipulated to extend Defendants' response deadline to ECF		
3	Nos. 536, 537, and 539 to January 20, 2022 , and the Sun's reply deadline to February 10, 2022 ,		
4	which was ordered by the Special Master, the parties submit this stipulation to vacate the Order		
5	entered at ECF No. 561. The parties have notified Special Master Pro of ECF No. 561 and he is		
6	aware that the parties are submitting this Joint Stipulation.		
7	DATED this 20th day of January 2022.	DATED this 20th day of January 2022.	
8	LEWIS ROCA ROTHGERBER CHRISTIE L	LP KEMP JONES LLP	
9			
10	By: /s/ Kristen L. Martini	By: /s/ Mona Kaveh	
11	E. Leif Reid, Bar No. 5750 Kristen L. Martini, Bar No. 11272	J. Randall Jones, Esq., Bar No. 1927 Michael J. Gayan, Esq., Bar No. 11135	
	Marla J. Hudgens, Bar No. 11098	Mona Kaveh, Esq., Bar No. 11825	
12	Nicole Scott, Bar No. 13757 One East Liberty Street, Suite 300	3800 Howard Hughes Parkway, 17 th Fl. Las Vegas, Nevada 89169	
13	Reno, Nevada 89501-2128	Lus vegus, nevadu 67107	
14	NG ANEL LI DICE DI LC	Richard L. Stone, Esq., Pro Hac Vice	
	PISANELLI BICE PLLC James J. Pisanelli, Bar No. 4027	Amy M. Gallegos, Esq., <i>Pro Hac Vice</i> David R. Singer, Esq., <i>Pro Hac Vice</i>	
15	Todd L. Bice, Bar No. 4534	JENNER & BLOCK LLP	
16	Jordan T. Smith, Bar No. 12097	515 South Flower Street, Suite 3300	
17	400 South 7th Street, Suite 300 Las Vegas, Nevada 89101	Los Angeles, California 90071	
18		Attorneys for Defendants/	
	ALIOTO LAW FIRM Joseph M. Alioto, <i>Pro Hac Vice</i>	Counterclaimant	
19	One Sansome Street, 35 th Floor		
20	San Francisco, California 94104		
21	Attorneys for Plaintiff/Counterdefendants	Stipulations addressing issues other than matters	
22		referred to the Special Master must be filed	
23		separately to be reviewed by the presiding Judge.	
24	IT IS SO ORDERED:		
25	Controle		
26	$\overline{\mathbf{U}}$	NITED STATES MAGISTRATE JUDGE	
27			
28	D	ATED:	